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May 24, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208

Dear Ms. Dortch:

On May 22nd, Christi Shewman, Joel Lubin, Saikat Sen, David Hostetter, and I, on behalf of AT&T, held a conference call with Travis Litman, Victoria Goldberg, Randy Clarke, and Pam Arluk of the Wireline Competition Bureau. On May 23rd, Christi Shewman, Joel Lubin, Saikat Sen, David Hostetter, and I, on behalf of AT&T, held a conference call with Deena Shetler, Travis Litman, Doug Sloten, Randy Clarke, and Dan Ball of the Wireline Competition Bureau. During the meetings we discussed issues related to a number of rules recently adopted by the Commission as part of comprehensive intercarrier compensation reform.

In particular, we discussed the rule waiver granted to price cap ILECs in the tariff review plan order¹ which extended the interstate filing date from July 1st, 2012 to July 3rd, 2012 and the applicability of this waiver to the ILECs' intrastate tariff filings. We also discussed AT&T's planned methodology to calculate the state E911 Rate Ceiling Component Charge using both highest composite and statewide E911 charges for the Residential Rate Ceiling comparison process on a state by state basis². We noted that inclusion of the highest composite E911 and exchange level EAS charges could result in AT&T not charging a residential/single line business ARC in some states even if a relatively small percentage of lines in the state exceeded the benchmark.

¹ See March 28, 2012 Order re: July 3, 2012 Annual Access Charge Tariff Filings, WCB/Pricing File No. 12-07, footnote 3.

² AT&T noted that its methodology for calculating the state E911 component charge, which uses the highest composite E911 charge paid by AT&T's residential customers, would not be appropriate for ILECs that are eligible to receive CAF ICC support. Our methodology is not appropriate for such ILECs because it overstates the number of lines that exceed the Residential Rate Ceiling, which would inflate the level of CAF ICC support these ILECs could receive.

Marlene H. Dortch
May 21, 2012
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If you have any questions or need additional information, please do not hesitate to contact me.
Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Brian J. Benison

cc: Deena Shetler
Travis Litman
Victoria Goldberg
Randy Clarke
Dan Ball
Doug Slotten
Pam Arluk